UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

BIBI DE MALMANCHE,

Plaintiff.

v.

GLENROCK ASSET MANAGEMENT ASSOCIATES, L.P., GLENROCK, INC., and REYNARD ASSET MANAGEMENT, INC.,

Defendants.

Case No.: 07-cv-10940 (KNF)

NOTICE OF MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

PLEASE TAKE NOTICE that at a date and time to be determined by the Court, attorneys for Plaintiff Bibi de Malmanche, shall move, before the Honorable Kevin N. Fox, United States Magistrate Judge, United States Courthouse, 500 Pearl Street, New York, New York, 10007, for the entry of an Order, pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, granting Plaintiff leave to file an amended complaint.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiff shall rely upon this Notice of Motion, the Memorandum of Law in Support of Notice of Motion for Leave to File Amended Complaint, and the Declaration of Jeanette Rodriguez-Morick submitted herewith.

Dated: New York, New York July 14, 2008

Respectfully submitted,

THOMPSON HINE LLP

Attorneys for Plaintiff Bibi-de Malmanche

By:

Jeanette Rodriguez-Morick
335 Madison Avenue, 12th Floor
New York, New York 10017

212.**9**08.**2**/900

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice of Motion for Leave to Amend the Complaint was served electronically through the Court's ECF System on the following Defendants' counsel on this 14th day of July 2008:

Mark J. Hyland Seward and Kissel LLP One Battery Park Plaza New York, NY 10004

One of Attorneys for Plaintiff Bibi de Malmanch